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**FILED**  
IN CLERK'S OFFICE  
US DISTRICT COURT E.D.N.Y.  
★ APR 19 2019 ★

**BROOKLYN OFFICE**

*Counsel for Plaintiffs and [Proposed]  
Lead Counsel for Class*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

-----X  
MICHAEL BEHRENDSEN, Individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

YANGTZE RIVER PORT AND LOGISTICS LIMITED,  
XIANGYAO LIU, XIN ZHENG, and TSZ-KIT CHAN,

Defendants.  
-----X

Case No.: 1:19-cv-00024-DLI-LB

**STIPULATION AND  
[PROPOSED] ORDER  
REGARDING SERVICE AND  
SCHEDULING FOR (1) FILING  
OF AMENDED COMPLAINT  
AND (2) BRIEFING ON  
MOTION TO DISMISS**

WHEREAS, on January 2, 2019, Plaintiff Michael Behrendson filed a Class Action Complaint for Violation of the Federal Securities Laws (the "Complaint") against Defendants, which asserted violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934, 15 U.S.C. § 78j(b) and 78t(a), and Rule 10b-5 promulgated thereunder, 17 C.F.R. § 240.10b-5 (ECF No. 1);

WHEREAS, on January 9, 2019, the Court issued summons as to Defendants Yangtze River Port and Logistics Limited ("Yangtze"), Tsz-Kit Chan, Xiangyao Liu, and Xin Zheng (ECF No. 4);

*clm*

WHEREAS, on March 4, 2019, Plaintiffs Michael Behrendson and Marion Garcia moved the Court to serve as lead plaintiffs of the class (ECF No. 5-6);

WHEREAS, on March 7, 2019, Plaintiff served a summons and Complaint on Defendants Yangtze;

IT IS HEREBY STIPULATED AND AGREED, by counsel for the Parties listed below, that:

1. The undersigned counsel for Defendants is authorized to and does accept service on behalf of Defendants Tsz-Kit Chan, Xiangyao Liu, and Xin Zheng, without prejudice and without waiver of any of Defendants' defenses, objections, or arguments in this matter or any other matters, except as to sufficiency of service of process.

2. Before the underlying case can proceed, a lead plaintiff and lead counsel must be appointed by the Court. The parties anticipate that after a lead plaintiff is appointed and lead counsel is approved by the Court, a consolidated or amended complaint will be filed by the lead plaintiff(s).

3. Within forty-five (45) days of an Order appointing lead plaintiff(s) and lead counsel, lead plaintiff(s) shall file a consolidated or an amended complaint, or notify defendants in writing that lead plaintiff(s) intend to rely on the current complaint.

4. In view of the fact that a consolidated or amended complaint is anticipated, and that lead plaintiff and lead counsel determinations remain, Defendants shall not be required to answer or otherwise respond in this matter until forty-five (45) days after lead plaintiff(s) file a consolidated or amended complaint, or otherwise designate in writing the operative complaint.

5. In the event that Defendants move to dismiss the operative complaint, lead plaintiff(s) shall have forty-five (45) days from the date Defendants file such motions to file

response briefs. Defendants shall have twenty (20) days from the date the lead plaintiff(s) files response briefs to file reply briefs.

DATED: April 10, 2019

The Rosen Law Firm, P.A.

By: /s/ Leah Heifetz-Li

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Leah Heifetz-Li (LH 0402)  
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*Counsel for Lead Plaintiff Movants Michael  
Behrendson and Marion Garcia*

**SO ORDERED:**

Dated: April \_\_, 2019

Respectfully Submitted,

Phillipson Uretsky, LLP

By: /s/ Jonathan Uretsky

Jonathan Uretsky  
111 Broadway, 8<sup>th</sup> Floor  
Short Hills, New Jersey  
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*Counsel for Defendants*

*Defendants' counsel  
shall file a notice  
of appearance forthwith.*

So Ordered: /s/ USMJ LOIS BLOOM  
4/18/19 Lois Bloom  
U.S. Magistrate Judge

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UNITED STATES DISTRICT JUDGE